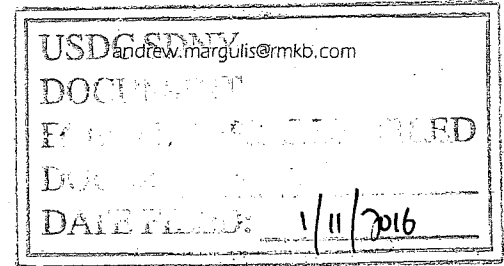


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MEMO ENDORSED

January 8, 2016

BY ECF and FEDERAL EXPRESS

Honorable Deborah A. Batts
United States District Judge
United States Courthouse
500 Pearl Street, Room 2510
New York, NY 10007

Re: Ipsos-Insight, LLC v. Greenwood
15-CV-07119 (DAB)

Dear Judge Batts:

This firm represents defendant/counterclaimant/third-party plaintiff Jon Greenwood ("Greenwood") in the referenced matter. We write jointly with counsel for Plaintiff Ipsos-Insight LLC and Third-Party Defendant Ipsos-Insight Corporation (collectively "Ipsos").

The parties are pleased to advise the Court that they have reached an agreement in principle to resolve this matter. The parties will now proceed to prepare formal settlement papers, which will include a dismissal of this action in its entirety.

In light of this anticipated resolution, the parties jointly request that the Court grant a further extension of the time for defendant Jon Greenwood ("Greenwood") to file his opposition to Ipsos's partial motion to dismiss the counterclaims/third-party claims.

The Court had previously granted a first extension on a joint request from the parties, and a second extension at the request of Greenwood, which was opposed in part by Ipsos.

In light of the settlement in principle, however, the parties now jointly request that Your Honor grant an extension so that no further time and expense has to be incurred on preparing the opposition and the parties can focus on documenting the settlement.

The parties hope to have this accomplished in the next 1-2 weeks. However, rather than setting a new date for the filing of the opposition, we request that the Court grant a temporary stay as to the filing of the opposition, with a direction that the parties report back to the Court by January 25, 2016 if a stipulation of dismissal has not been filed by that date.

GRANTED
1/6/DAB
1/11/16

If anything occurs that derails the agreement in principle and the litigation would have to move forward, the parties would so advise the Court immediately and request that the stay be



Honorable Deborah A. Batts
January 8, 2016

Page 2

lifted, and Greenwood would then agree to file the opposition within three (3) days of the lifting of the stay.

We thank the Court for its consideration of this matter.

Respectfully submitted,

Andrew L. Margulis

cc: Steven M. Kayman, Esq.
Stacey P. Eilbaum, Esq.

SO ORDERED

DEBORAH A. BATTS
UNITED STATES DISTRICT JUDGE

1/11/2016